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Counsel for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MAXIMILIAN KLEIN and SARAH
GRABERT, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware corporation
headquartered in California,

Defendant.

Case no.: 5:20-cv-08570-LHK

VICKIE SHERMAN, LEZAH NEVILLE-
MARRS, KATHERINE LOOPERS, and
JARRED JOHNSON, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware corporation
headquartered in California,

Defendant.

Case no.: 3:20-cv-08721-LB

**DECLARATION OF TINA WOLFSON IN
SUPPORT OF ADMINISTRATIVE
MOTION TO RELATE CASES**

**DECLARATION OF TINA WOLFSON
IN SUPPORT OF ADMINISTRATIVE MOTION TO RELATE CASES**

1 I, Tina Wolfson, make the following declaration pursuant to 28 U.S.C. § 1746:

2 1. I make this declaration upon personal knowledge and am competent to testify to
3 the facts set forth herein.

4 2. I am a partner with the law firm Ahdoot & Wolfson PC and counsel for the Plaintiffs
5 Vickie Sherman, Lezah Neville-Marrs, Katherine Loopers, and Jarred Johnson in *Sherman et*
6 *al v. Facebook, Inc.*, No. 3:20-cv-08721-LB, filed in this District on December 9, 2020.

7 3. I submit this Declaration in support of Plaintiffs' Administrative Motion on to Relate
8 Cases.

9 4. Civil Local Rule 3-12 requires that this Administrative Motion to Relate Cases be
10 promptly filed. No counsel has yet formally appeared for Facebook, Inc. in either the *Klein*
11 or the *Sherman* action. Thus a stipulation could not be obtained with Facebook's official
12 counsel of record prior to filing of the Administrative Motion. However, Plaintiffs met and
13 conferred with counsel representing Facebook in *Reveal Chat Holdco LLC, et al., v. Facebook,*
14 *Inc.*, 5:20-cv-00363-BLF on December 16, 2020. Counsel for Facebook in *Reveal Chat* stated
15 they did not know if they would be representing Facebook in the *Klein* and *Sherman* actions,
16 but requested that Plaintiffs state Facebook's position as follows: "Facebook agrees that the
17 *Sherman* and *Klein* cases meet the standard for related cases in Local Civil Rule 3-12, but
18 believes that both cases are also related to a previously filed case pending before Judge
19 Freeman: *Reveal Chat et al v. Facebook, Inc.*, No. 20-cv-00363-BLF. Consistent with the Local
20 Rules, Facebook has already filed before Judge Freeman motions to relate both the *Klein* and
21 *Sherman* cases with *Reveal Chat* and therefore respectfully requests that the court not rule on
22 this motion until Judge Freeman has a chance to decide those motions." Plaintiffs in *Klein*
23 have opposed Facebook's Motion For Administrative Relief To Consider Whether Cases
24 Should Be Related Pursuant To Civil L.R. 3-12 filed by Facebook in *Reveal Chat*. Plaintiffs
25 in *Sherman* are similarly opposing motions to relate to *Reveal Chat*.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 EXECUTED this 21 December 2020.

4 /s/ Tina Wolfson.
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